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UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THEIR MOTION
FOR RELIEF FROM AND
EMERGENCY MOTION FOR STAY
OF NON-DISPOSITIVE PRETRIAL
ORDER OF MAGISTRATE JUDGE**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Defendants' Administrative Motion to File Under Seal Portions of Their Motion for
6 Relief from and Emergency Motion for Stay of Non-Dispositive Pretrial Order of Magistrate
7 Judge.

8 2. I have reviewed the following documents and confirmed that only the portions
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Motion for Relief from and Emergency Motion for Stay of Non-Dispositive Pretrial Order of Magistrate Judge ("Motion")	Highlighted Portions	Plaintiff (green) Defendants (blue)
Exhibit 1	Entire Document	Plaintiff

16 3. The blue-highlighted portions of the Motion identify specific software modules
17 described in highly confidential Disclosure Schedules to the Put Call Agreement (Dkt. 515-11).
18 These Disclosure Schedules were filed entirely under seal, and the Court granted sealing at Dkt.
19 707. Here, the identification of software modules reveals technical features developed by
20 Ottomotto LLC and acquired by Uber. This highly confidential information is not publicly
21 known, and their confidentiality is strictly maintained. I understand that this information could be
22 used by competitors or counterparties to Uber's detriment, including to gain an advantage over
23 Uber in development strategy. For example, disclosure of Uber and Ottomotto's LiDAR-related
24 technical features would allow competitors to understand Uber's LiDAR development and
25 strategy, and allow them to tailor their own LiDAR development. If such information were made
26 public, I understand Uber's competitive standing could be significantly harmed.

